



**Northeast
Utilities System**

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June 22, 2004

VIA OVERNIGHT DELIVERY

Ms. Mary L. Cottrell
Dept. of Telecommunications & Energy
One South Station
Boston, MA. 02110

Re: Docket No. 03-62-A, Use of the New England Generation Information System

Dear Ms. Cottrell:

On February 18, 2004, the Department of Telecommunications and Energy issued the New England Generation Information System, D.T.E. 03-62-A ("Order"), investigating the use of the New England Generation Information System for purposes of complying with the Information Disclosure Requirements contained in 220 C.M.R. § 11.06. A Working Group ("Working Group") was convened to develop recommendations for those issues the Department determined were not resolved in its Order and warranted further investigation, including: (1) protocols by which distribution companies will provide information to the Department to verify the accuracy of the Massachusetts sales that are included on suppliers' NE-GIS sub-accounts, and (2) the manner in which the EBT's can be used to provide information that could be used by the Department to verify the accuracy of the product-specific sales that are included on suppliers' NE-GIS sub-accounts (3) the mapping of the fuel source categories included on NE-GIS certificates to the fuel source categories listed on the information disclosure labels (4) the development of guidelines to govern how suppliers of renewable resource products may use prospective information on their disclosure labels during their initial twelve months of operation and (5) revisions to the NE-GIS rules that would increase the accuracy of the data included on the disclosure labels. New England Generation Information System, D.T.E. 03-62-A, at 25-26 (February 18, 2004).

Attached are the recommendations of the Working Group for issue 5, referenced above.

Thank you.

Very truly yours,

Joanne M. Stratton

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Massachusetts Distribution Companies
D.T.E. 03-62-A

Issue 5 - Background:

The Working Group was asked to review the NE-GIS rules to determine if rule revisions would increase the accuracy of the data included on the disclosure labels. The issue was raised that the labor characteristics disappeared on the GIS certificates if there was a mix of fuel source. The manner in which NE-GIS determines each generator's labor characteristics resulted in inaccurate labor information being included on the suppliers' quarterly NE-GIS reports. The way NE-GIS certificates list generators' labor characteristics was established in Appendix 2.4, Part 4 of the NE-GIS Rules.

The labor characteristics are currently available in the state regulator reports only. Automated Power Exchange ("APX") is in the process of updating those reports to include the labor percentage associated with all the certificates assigned to load in GIS, and will be available to the public on the web-site to everyone some time in 2004. Since the residual mix is assigned to load that does not otherwise have GIS certificates associated with it, this will ultimately give the suppliers access to the information they need.

Working Group Recommendation:

A NE-GIS Rule Revision does not seem to be warranted. Until the labor characteristics become available on the web-site, the recommendation for the 4th quarter 2003 and possibly the 1st quarter 2004 reporting is for the Distribution Companies to obtain the information directly from the Administrator for APX, by telephone request and then report it on their disclosure labels. Once the information is available to the public on the web-site, each Distribution Company will be able to obtain the labor percentage to be included on their disclosure labels.

The labor characteristics needed are under column "D" of the following chart.

A	B	C	D	E	F	G	H
Year	Quarter	Fuel	Labor Characteristics CBA - Yes (%)	# of Certificates	CO2	CO	Hg
2003	3	Residual Mix	39.98114527	31406439	818.0419	0.307441	3.51E- 06

On May 28, 2004, the recommendation was submitted to the entire working group for comments, concerns or concurrence. The entire working group did not object to this recommendation.

Another issue identified by the Working Group that warranted further investigation was: Establishing a schedule by which Suppliers should (a) distribute quarterly labels to customers and (2) submit the Annual Report to the MA DTE.

At an EBT meeting in June it was decided the Distribution Companies could stay with their current schedule. Once the move was made to use the GIS data, there wouldn't be any reason to change that schedule. There was no concern with the schedule being different between Distribution Companies.